



# COUNTY OF ORANGE

EDWARD A. DIANA  
County Executive

## Department of Law

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### MEMO ENDORSED

May 21, 2008

**BY FACSIMILE TO 212-805-7949**

The Hon. P. Kevin Castel  
United State District Judge  
United States Courthouse  
500 Pearl St., Room 2260  
New York, NY 10007

RE: West v. Brickman, et al.  
Case No. 07 CV 7260

Dear Judge Castel:

This office represents Valerie Zeppelin and Diane Tuttle in the above-referenced action. The Plaintiff is a former inmate of the Orange County Jail and brings this action pro se. Ms. Zeppelin and Ms. Tuttle are corrections officers at the jail. Other defendants include nurses and medical staff employed at the facility.

This office, on behalf of Ms. Zeppelin and Ms. Tuttle plan to file a 12(b)(6) motion to dismiss the complaint. We have tried to reach the plaintiff to ask for her consent to an extension of the deadline to respond, from May 23, 2008 to June 20, 2008, but she was apparently released from jail on March 26, 2008 and left no forwarding address. We sent a letter to the address where she lived prior to her incarceration, but have not heard from her.

For this reason, we request that the Court approve the June 20, 2008 deadline for our response to the complaint.

Very truly yours,

*Laura Wong-Pan*  
Laura Wong-Pan  
Senior Assistant County Attorney

cc: Yolanda West (by mail to last known residential address)  
Todd J. Aschbacher, Esq.  
Risk  
CSI, Inc.

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*Defendants time to answer or move is extended to June 20. A letter is called to the Court's I understand practice. Defendants want to make a motion they should a letter explain the legal and factual basis requests a pre-motion conference 5-21-08*

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